

UNITED STATES OF AMERICA

v.

MOHAMED BAHI,

Defendant.

24 Mag. 3535

Robert B. Sobelman, pursuant to Title 28, United States Code, Section 1746, hereby declares under penalty of perjury that the following is true and correct:

2. The defendant was charged in a complaint dated October 7, 2024, with witness tampering in violation of 18 U.S.C. § 1512, and destruction of records in violation of 18 U.S.C. § 1519. The defendant was arrested on October 8, 2024, was presented before Magistrate Judge Robert W. Lehrburger on October 8, 2024, and was ordered to be released on bail subject to certain conditions. At the presentment, defense counsel consented to a waiver of his client's right pursuant to Federal Rule of Criminal Procedure 5.1 to a preliminary hearing within 21 days of the initial appearance. Accordingly, under the Speedy Trial Act the Government initially had until November 7, 2024, within which to file an indictment or information.

3. On November 6, 2024, Magistrate Judge Jennifer E. Willis entered an Order of Continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A), extending the time within which an indictment or information would otherwise have had to be filed in this case until December 9, 2024.

4. On December 4, 2024, Magistrate Judge Henry J. Ricardo entered an Order of Continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A), extending the time within which an indictment or information would otherwise have had to be filed in this case until January 8, 2025.

5. On January 6, 2025, Magistrate Judge Barbara Moses entered an Order of Continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A), extending the time within which an indictment or information would otherwise have had to be filed in this case until February 7, 2025.

6. On February 7, 2025, Magistrate Judge Ona T. Wang entered an Order of Continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A), extending the time within which an indictment or information would otherwise have had to be filed in this case until March 10, 2025.

7. On March 10, 2025, Magistrate Judge Robert W. Lehrburger entered an Order of Continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A), extending the time within which an indictment or information would otherwise have had to be filed in this case until April 9, 2025.

8. On April 4, 2025, Magistrate Judge Barbara Moses entered an Order of Continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A), extending the time within which an indictment or information would otherwise have had to be filed in this case until May 9, 2025.

9. On May 5, 2025, Magistrate Judge Stewart D. Aaron entered an Order of Continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A), extending the time within which an indictment or information would otherwise have had to be filed in this case until June 9, 2025.

10. On June 2, 2025, Magistrate Ona T. Wang entered an Order of Continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A), extending the time within which an indictment or information would otherwise have had to be filed in this case until July 9, 2025.

11. On July 7, 2025, Magistrate Judge Sarah L. Cave entered an Order of Continuance, pursuant to 18 U.S.C. § 3161(h)(7)(A), extending the time within which an indictment or information would otherwise have had to be filed in this case until August 8, 2025.

12. As noted in certain of the Government's prior requests, the defendant previously entered into a written plea agreement with the Government. However, defense counsel Derek Adams, Esq., and the Government are continuing to have discussions regarding the resolution of this case and do not anticipate a resolution before the deadline under the Speedy Trial Act expires on August 8, 2025.

13. Therefore, the Government is requesting a 30-day continuance until September 8, 2025, to continue the foregoing discussions and reach a resolution of this matter. On August 4, 2025, defense counsel Derek Adams, Esq., consented to this request in writing. This application has been authorized by Assistant United States Attorney Andy Dember, Deputy Chief of the Criminal Division.

14. For the reasons stated above, the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and the defendant in a speedy trial.

Dated: New York, New York  
August 5, 2025

/s/ Robert B. Sobelman  
Robert B. Sobelman  
Assistant United States Attorney  
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